

EXHIBIT A

Matt Acosta

From: Ryan Marton <ryan@martonribera.com>
Sent: Monday, October 17, 2022 3:48 PM
To: Matt Acosta; Nick Kliewer; Phil Haack; Darryl Adams
Cc: Andrew Lin; Xavier Bennett; Laura Marczak; Hector Ribera; Carolyn Chang
Subject: Re: Zoho v. Liberty Peak Ventures - Claim Construction schedule

CAUTION: External Sender.

Hi Matt,

We inadvertently left these 112 issues off the contentions. Has Liberty Peak been prejudiced by this?

Let me know if you would like chat.

Thanks,
Ryan

From: Matt Acosta <macosta@pcrfirm.com>
Date: Monday, October 17, 2022 at 1:35 PM
To: Ryan Marton <ryan@martonribera.com>, Nick Kliewer <nkliewer@pcrfirm.com>, Phil Haack <phaack@martonribera.com>, Darryl Adams <dadams@sgbfirm.com>
Cc: Andrew Lin <alin@pcrfirm.com>, Xavier Bennett <xbennett@pcrfirm.com>, Laura Marczak <lmarczak@pcrfirm.com>, Hector Ribera <hector@martonribera.com>, Carolyn Chang <carolyn@martonribera.com>
Subject: RE: Zoho v. Liberty Peak Ventures - Claim Construction schedule

Hi Ryan,

Because our client is curious, what is the good faith basis for amending, when these 112 arguments could have been asserted in the original DICs that were served?

Many thanks,
Matt

From: Ryan Marton <ryan@martonribera.com>
Sent: Tuesday, October 11, 2022 3:16 PM
To: Nick Kliewer <nkliewer@pcrfirm.com>; Phil Haack <phaack@martonribera.com>; Darryl Adams <dadams@sgbfirm.com>
Cc: Matt Acosta <macosta@pcrfirm.com>; Andrew Lin <alin@pcrfirm.com>; Xavier Bennett <xbennett@pcrfirm.com>; Laura Marczak <lmarczak@pcrfirm.com>; Hector Ribera <hector@martonribera.com>; Carolyn Chang <carolyn@martonribera.com>
Subject: Re: Zoho v. Liberty Peak Ventures - Claim Construction schedule

CAUTION: External Sender.

Nick,

Your proposed schedule is fine. Also please find some minor amendments to our invalidity contention cover pleading. We've added a handful of 112 issues on pages 18 and 19 that we intend to address during claim construction. Let us know if you have an objection to this amendment.

Thanks,
Ryan

From: Nick Kliewer <nkliewer@pcrfirm.com>

Date: Tuesday, October 11, 2022 at 12:30 PM

To: Phil Haack <phaack@martonribera.com>, Ryan Marton <ryan@martonribera.com>, Darryl Adams <dadams@sgbfirm.com>

Cc: Matt Acosta <macosta@pcrfirm.com>, Andrew Lin <alin@pcrfirm.com>, Xavier Bennett <xbennett@pcrfirm.com>, Laura Marczak <lmarczak@pcrfirm.com>

Subject: RE: Zoho v. Liberty Peak Ventures - Claim Construction schedule

Gentlemen,

We have reviewed your list of terms for construction. In light of the number of terms cited and in order to have a meaningful conference prior to claim construction briefing, we suggest that we set intermediate deadlines and for a modification of the Pre-Markman Scheduling Order:

Current Date	Proposed Date	Event
	October 24, 2022	Parties exchange proposed claim constructions
	November 4, 2022	Parties disclose extrinsic evidence. The parties shall disclose any extrinsic evidence, including the identity of any expert witness they may rely upon with respect to claim construction or indefiniteness. With respect to any expert identified, the parties shall identify the scope of the topics for the witness's expected testimony. With respect to items of extrinsic evidence, the parties shall identify each such item by production number or produce a copy of any such item if not previously produced
	November 14, 2022	Deadline to meet and confer to narrow terms in dispute and exchange revised list of terms/constructions.
October 26, 2022	November 21, 2022	Joint Claim Construction Statement
November 9, 2022	December 2, 2022	Close of Claim Construction Discovery
December 14, 2022	December 16, 2022	Opening Claim Construction Brief
January 16, 2023	January 16, 2023	Reply Claim Construction Brief
February 21, 2023	February 21, 2023	Tutorial / Markman Hearing

Please let us know if this schedule is acceptable.

Regards,

-Nick

Nick Kliewer, Associate
PLATT CHEEMA RICHMOND PLLC
nkliewer@pcrfirm.com

From: Phil Haack <phaack@martonribera.com>
Sent: Wednesday, October 5, 2022 4:47 PM
To: Nick Kliewer <nkliewer@pcrfirm.com>; Matt Acosta <macosta@pcrfirm.com>; Andrew Lin <alin@pcrfirm.com>; Xavier Bennett <xbennett@pcrfirm.com>; Laura Marczak <lmarczak@pcrfirm.com>
Cc: Ryan Marton <ryan@martonribera.com>; Darryl Adams <dadams@sgbfirm.com>
Subject: Zoho v. Liberty Peak Ventures - Terms for Construction

CAUTION: External Sender.

Counsel,

Please find attached Zoho's identification of terms requiring construction.

Best,
Phil

Phil Haack
[Marton Ribera Schumann & Chang LLP](mailto:phil@martonribera.com)
phil@martonribera.com | (415) 360-2517

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